

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

IAN MURRAY,)	
)	
Plaintiff,)	
)	
v.)	
)	Removed from 17 L 95
TARGET CORPORATION, a Minnesota Corporation)	
d/b/a TARGET STORES, and/or DAYTON HUDSON)	
CORPORATION,)	Jury Demanded
)	
Defendant.)	

NOTICE OF REMOVAL

TARGET CORPORATION, the Defendant in the above entitled cause, seeks removal from the Circuit Court of Lake County and to the United States District Court, Northern District of Illinois, Eastern Division and, in support thereof, allege as follows:

1. This action was commenced against TARGET CORPORATION, in the Circuit Court of Lake County, Illinois on February 2, 2017. A copy of Plaintiff's Complaint was served upon Defendant TARGET CORPORATION on February 8, 2017.

2. At the time the action was commenced and since then, upon information and belief, the Plaintiff was and is a citizen of the County of Lake, State of Illinois and Defendant, TARGET CORPORATION, was and is a corporation organized and existing under the laws of the State of Minnesota with its principal place of business in Minneapolis, Minnesota.

3. The amount in controversy exceeds \$75,000.00 exclusive of interest and costs, as appears from Plaintiff's Complaint. (A copy of which is attached hereto and incorporated herein by reference in this Notice as Exhibit "A"). Plaintiff, IAN MURRAY, allegedly sustained severe and permanent injuries and damages. Upon information and belief, Plaintiff suffered a fracture of his foot/ankle in three places, underwent closed reduction, was placed in a cast and participated in physical therapy. Plaintiff has also demanded judgment against Defendant in an amount in excess of \$50,000.00.

4. This action is a civil one of which the United States District Courts have original jurisdiction under 28 USC §1332.

5. The Defendant TARGET CORPORATION attaches to this notice copies of all process, pleadings, and orders that have been served on it. (A copy of which are attached hereto and incorporated by reference in this Notice as Exhibit "B").

WHEREFORE, the Defendant, TARGET CORPORATION, prays that this cause be removed to the United States District Court for the Northern District of Illinois.

BRYCE DOWNEY & LENKOV LLC

TARGET CORPORATION,

By: s:/Christopher M. Puckelwartz
One of Defendant's Attorneys

Rich Lenkov, #6231079
Christopher M. Puckelwartz, #6243690
BRYCE DOWNEY & LENKOV LLC
200 North LaSalle Street, Suite 2700
Chicago, IL 60601
Phone: 312-377-1501
Fax: 312-377-1502
rlenkov@bdlfirm.com
cpuckelwartz@bdlfirm.com

STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

Christopher M. Puckelwartz, being first duly sworn on oath, deposes and says that:

1. He is one of the attorneys for the Defendant in this cause;
2. He has prepared and read the notice of removal filed in this cause and has personal knowledge of the facts and matters contained in it; and
3. The facts and allegations contained in the notice of removal are true and correct.

BRYCE DOWNEY & LENKOV LLC

TARGET CORPORATION,

By: s./Christopher M. Puckelwartz
One of Defendant's Attorneys

Rich Lenkov, #6231079
Christopher M. Puckelwartz, #6243690
BRYCE DOWNEY & LENKOV LLC
200 North LaSalle Street, Suite 2700
Chicago, IL 60601
Phone: 312-377-1501
Fax: 312-377-1502
rlenkov@bdlfirm.com
cpuckelwartz@bdlfirm.com